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U.S. DISTRICT COURT  
SOUTHERN DIST OHIO  
WEST DIV CINCINNATI

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF OHIO  
WESTERN DIVISION

UNITED STATES OF AMERICA,

Plaintiff,

v.

JONATHAN SHAWN THOMSEN,

Defendant.

CASE NO. **1:20CR 048**

JUDGE JUDGE BLACK

INFORMATION

18 U. S. C. § 1343

26 U. S. C. § 7206(1)

THE UNITED STATES ATTORNEY CHARGES:

**COUNT 1**  
**(Wire Fraud)**

1. At all relevant times, Defendant **JONATHAN SHAWN THOMSEN** was a resident of the Southern District of Ohio.
2. From approximately June 2006 until April 2017, Defendant **JONATHAN SHAWN THOMSEN** was employed by Natus Medical Inc. ("Natus"), a Delaware corporation headquartered in Pleasanton, California, which manufactures medical devices and serves as a software and service provider for hospitals, clinics, and laboratories worldwide. As part of his duties as a project manager for Natus's Technical Service Team, Defendant **JONATHAN SHAWN THOMSEN** routinely traveled to hospitals throughout the United States and was reimbursed for his travel expenses.
3. From approximately May 2012 to April 2017, while serving as a project manager for Natus, Defendant **JONATHAN SHAWN THOMSEN** devised and intended to devise a scheme to defraud Natus and to obtain money and property by embezzling funds in excess of his authorized pay and compensation, through means of materially false and fraudulent pretenses,

representations, and promises. The total net amount embezzled by Defendant **JONATHAN SHAWN THOMSEN** from Natus under this scheme is approximately \$517,737.00.

4. As part of and in furtherance of this scheme, Defendant **JONATHAN SHAWN THOMSEN** submitted false and fraudulent travel expense claims for payment, using the online Concur travel reporting tool ("Concur") which Natus used in order to process requests for travel reimbursements. Specifically, Defendant **JONATHAN SHAWN THOMSEN** submitted false and fraudulent expense reports through the Concur system, claiming reimbursement for travel expenses, including airfare, purportedly incurred by Defendant **JONATHAN SHAWN THOMSEN**. In truth and in fact, Defendant **JONATHAN SHAWN THOMSEN** was not entitled to reimbursement as he did not actually purchase airfare or undertake the business travel for which he was requesting reimbursement.

5. As part of and in furtherance of this scheme, Defendant **JONATHAN SHAWN THOMSEN** transmitted and caused to be transmitted certain signs and signals, that is, wire transmissions, accessing Concur's servers located in the State of Washington. Specifically, from his computer in the Southern District of Ohio, Defendant **JONATHAN SHAWN THOMSEN** transmitted and caused to be transmitted interstate expense reports with fraudulent supporting documentation through Concur's online portal. Once the requests were approved through Concur, Natus issued payment to American Express or directly to Defendant **JONATHAN SHAWN THOMSEN** through interstate electronic bank-to-bank transfers using the Automated Clearing House (ACH).

7. For example, on or about August 25, 2015, in the Southern District of Ohio, Defendant **JONATHAN SHAWN THOMSEN**, for the purpose of executing the scheme to defraud, knowingly transmitted and caused to be transmitted certain interstate wire

communications, to wit: submitting through Concur a false and fraudulent expense report including a reimbursement claim for a U.S. Airways airline ticket of \$2,005.39 purportedly purchased using his corporate American Express card. In reality, Defendant **JONATHAN SHAWN THOMSEN** never incurred this expense. Natus approved the report and made payment to the corporate American Express card in the name of Defendant **JONATHAN SHAWN THOMSEN** through an interstate electronic ACH transfer. These funds were then used for the personal benefit of Defendant **JONATHAN SHAWN THOMSEN**.

**In violation of 18 U.S.C. § 1343.**

**COUNT 2**  
**(Making or Subscribing a False Income Tax Return)**

8. The allegations in preceding paragraphs 1-5 are incorporated as if fully restated herein.

9. On or about February 29, 2016, in the Southern District of Ohio, Defendant **JONATHAN SHAWN THOMSEN** did willfully make and subscribe a 2015 Form 1040 Tax Return, which was verified by written declaration that it was made under the penalties of perjury and which Defendant **JONATHAN SHAWN THOMSEN** did not believe to be true and correct as to every material matter. Specifically, the return did not include income that was received by Defendant **JONATHAN SHAWN THOMSEN** during 2015 from the embezzlement scheme described in Count 1 of this Information.

**In violation of 26 U.S.C. § 7206(1).**

**DAVID M. DEVILLERS**  
**UNITED STATES ATTORNEY**

  
**EBUNOLUWA A. TAIWO**  
Assistant United States Attorney